

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 WESTERN DIVISION - LOS ANGELES

4 MOOG INC.,) Case No. CV 22-9094-GW (MARx)
5 Plaintiff,)
6 v.) Los Angeles, California
7 SKYRYSE, INC., et al.,) Wednesday, June 7, 2023
8 Defendants.) 11:46 A.M. to 1:00 P.M.
9 _____)
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12 TRANSCRIPT OF PROCEEDINGS
13 BEFORE THE HONORABLE MARGO A. ROCCONI
14 UNITED STATES MAGISTRATE JUDGE

15 Appearances: See Page 2
16 Deputy Clerk: Valerie Velasco
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1 LOS ANGELES, CALIFORNIA, WEDNESDAY, JUNE 7, 2023, 11:46 A.M.

2 THE CLERK: Calling Case No. LA 22-CV-09094-GW-MAR,
3 *Moog Inc. v. Skyryse, Inc., et al.*

4 Starting with the plaintiff's counsel, please state
5 your appearances.

6 LAI L. YIP: Good morning, Your Honor. My name is
7 Lai Yip with the Sheppard Mullin firm here on behalf of Moog,
8 and with me is my colleague Kazim Naqvi, my colleague
9 Rena Andoh is joining us by Zoom, and we may have a
10 representative from Moog on the line, Joe Polniak.

11 THE COURT: Good morning.

12 MS. YIP: Good morning.

13 GABRIEL S. GROSS: Good morning, Your Honor.
14 Gabe Gross, Latham and Watkins. My associate Rachel Horn and
15 I are here representing Skyryse, the defendant and
16 counterclaimant.

17 THE COURT: Good morning.

18 MR. GROSS: Good morning.

19 THE COURT: All right. Let me go ahead and hear
20 from plaintiff -- movant, I should say, on this motion.

21 MR. GROSS: Thank you, Your Honor. And I just
22 wanted to thank the Court for holding this in-person hearing.
23 The case, as the Court well knows, has been pending for some
24 time, but this is the first opportunity we've had to be in
25 this court and before Your Honor; so thank you for setting

1 Interrogatory No. 1 to require something that Skyryse itself
2 said on the record was not required by the interrogatory.

3 We also believe that implicit in Skyryse's
4 admission in its reply brief is the recognition that to
5 require something like that, a line-by-line identification
6 for tens of thousands of source code files, would be
7 extremely burdensome and unreasonable, and in actuality, it
8 would take many months to do something like that.

9 And what would occur here is because we have this
10 procedural mechanism whereby discovery is stayed until a
11 trade -- this trade secret dispute is resolved, it would
12 functionally grind this case to a halt, and that's very
13 problematic for Moog because we have a need for relief here.
14 We have had our trade secrets taken from us, and they include
15 highly sensitive government and military data, and we need
16 protection for that information.

17 Skyryse's other arguments regarding the supposed
18 deficiency of our trade secret identification is largely
19 premised on a mischaracterization of our trade secret
20 identification. It's like as if Skyryse is talking about
21 some other trade secret identification that's out there,
22 rather than the one that's before us and before the Court.
23 For example, they say over and over again that we merely
24 pointed to documents, but even a cursory review of the trade
25 secret identification shows that's not true. What we have

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CERTIFICATE

I certify that the foregoing is a correct transcript
from the electronic sound recording of the proceedings in the
above-entitled matter.

<u>/s/ Julie Messa</u>	<u>June 24, 2023</u>
Julie Messa, CET**D-403	Date
Transcriber	